

Dennis Wayne Greer (Jr.) SPNO1670605  
TXID #13014321  
1200 Baker St. (3E2A)  
Houston, Tx. 77002  
Vs.

Cause No: \_\_\_\_\_  
To Be Assigned

Harris County Sheriff's Office and its Agents  
1200 Baker St.  
Houston, Tx. 77002

United States Courts  
Southern District of Texas  
FILED

JUL 18 2022

Nathan Ochsenrath, Clerk of Court

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TO THE HONORABLE COURT:

Dennis W. Greer Jr., plaintiff, complains of the Harris County Sheriff's Office and its Agents, and for cause of action shows.

I.

This cause of action arises under the first, fourth, fifth, sixth, eighth, thirteenth, and fourteenth Amendments to the United States Constitution and under United States Code Title 42, Sections USCS § 1981, USCS § 1982, USCS § 1983, and USCS § 1985. Jurisdiction of the Court is invoked pursuant to United States Code Title 18 USCS § 1961 and United States Code Title 28 section 1343.

II.

Plaintiff is currently and at all applicable times was a prisoner in The United States of America, the state of Texas, and city of Houston at the address of including but not limited to 500 Airtex Dr. #803, Houston, Tx. 77090

and 1200 Baker St., Houston, Tx. 77002, Harris County Sheriff's Office County Jail.

### III.

Defendant is currently and at all applicable times was the Harris County Sheriff's Office and its Agents and any and all entities and agents, state actors, and private actors/citizens including but not limited to private and public civilians as third party defendant in the commission of Title 18 USC § 1961 (all related provisions), Title 42 USC § 1983 and 1985, and Title 28 USC § 1343

### IV.

All acts of the defendants and the defendants agents specified in this complaint were done by the defendant or such agents under the color and practice of the statutes, regulations, customs, and procedure of the State of Texas and under the directions of the defendant acting in their capacity as the Harris County Sheriff's Office and their agents, individually and in their official capacities as patrol officers, jail officials including but not limited to Harris County Sheriff Ed Gonzales, any other unknown employees of the Harris County Sheriff's Office and its Agents, including any other third party defendants

### V.

Actions of the defendants and the defendants agents have violated plaintiffs rights to first amendment of the United States Constitution of freedom of speech, because I have the right to protest the

Government, as well as the right to make publicly known my intent and actual application of exercising my legal rights without fear of retaliation of doing so; the exercise of my fourth amendment by use of my first amendment by declaring to defend myself from illegal and unreasonable search and seizures, the fifth amendment, from violations of due process of the law, and just compensation, by making police reports to law enforcement by calling 911 for emergency assistance with reporting crimes, by use of internet for by the means of reporting crimes to different law enforcement authorities, security devices and kiosk records held at the Harris County Sheriff's Office County Jail of my housing locations and SPNO1670605 and kiosk password combination for the use of keystrokes for investigative purposes, as well as FaceBook and FaceBook live by sequence of events by means of recording videos and posting video and statements as a means of making known a trail of hard evidence, to use in my favor and/or defense in the event I need to refer to hard evidence to contest to any false allegations, and or any fabricated evidence that may lead to civil suits, or any frivolous criminal charges; my sixth and eighth amendments prohibiting any and all cruel and unusual punishments, some of which I've already reported to Internal Affairs, and The Texas Commission on Inmate Jail Standards as well as exhausting grievance procedures; my thirteenth and fourteenth amendments of Equal Protection and Just Compensation Clause which are enjoyed by white citizens also including but not limited to United States Code Title 42 Section 1983 Conspiracy of a black person, which I've been undergoing since at least including but not limited to July 9, 1998 when I was given the alias name Dennis L. Greer from a Burglary of a Habitation with fingerprint evidence matching the name Dennis L. Greer instead of my birth given name with AFIS records to match in at least the year of 1995 of Dennis Wayne Greer Jr.;

which coincides with violations of Title 18 USC § including but not limited to 1028, 1029, 1341, 1343, 1344, 1503, 1510, 1511, 1512, 1513, and 1957.

## VI.

Plaintiff has pursued administrative remedies by writing grievances, Texas Commission On Inmate Jail Standards, Internal Affairs, State Senator John Cornyn, United States President Joe Biden, sending notarized affidavits to Marilyn Burgess for Kim Ogg, Tiffany Persaud, Harris County Sheriff's Ed Gonzales, 230th District Judge Chris Morton, and Court Appointed Attorney Dorian Cotlar, also by writing at the time in 1999 Harris County Sheriff Tommy Thomas; and has protested these action by filing a 1983 invoking the courts by Title 28 USC § 1343 for Civil Action No. H-21-2367 as well as 2254 for the same. As well as Civil Action No's H-22-0987 and 4:22-cv-01010 and was not accorded any relief.

## VII.

WHEREFORE, plaintiff request judgement from this court

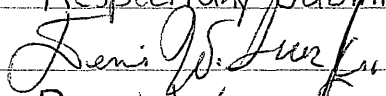
1. Declaring that the actions of the defendant and his or her age violate the Constitution of the United States

2. Granting a preliminary and permanent injunction enjoining defendant and his or her agents from using fraud by means of deception (a violation of 18 USC § 1961) scare tactics to conspire and retaliate against me for exercising my legal rights, and to prevent the

fabrication of evidence to pursue more frivolous charges against me; see: (State v. Delgado, 2009 Tex. App. LEXIS) and including but not limited to monetary compensation for malicious prosecutions, compensation for any arrest or imprisonments, including damages for discomfort or injury to my health and/or loss of time and deprivation of the society.

3. Awarding plaintiff the reasonable cost and expenses of this action including but not limited to any filing fees and or cost for filing purposes of this action and/or any past due filing fees for any other actions relating to this action, including reasonable attorney fees pursuant to Title 42 United States Code Section 1988

4. Granting Plaintiff including but not limited to any such other and further relief as the court may deem just, including but not limited to monetary compensation for harassments leading to nightmare disorders, including but not limited to punitive damages since my first arrest in 1994 for evading arrest near T.C. Jester off W. Little York.

Respectfully Submitted,  
  
Dennis Wayne Greer Jr.  
1200 Baker St. (3E2A)  
Houston, Tx. 77002  
(936)-209-9145



Dennis W. Greer (Jr.) SPNO1670605  
 1200 Baker St. (3E2A) TXID13014321  
 Houston, Tx. 77002

Cause #s 17610840, and 23819630

## Affidavit

Vs  
 Martin Flores (Bar #24113658) and his Agents  
 1201 Franklin St. 13th Floor  
 Houston, Tx. 77002

Before me, the undersigned authority personally appeared Dennis Wayne Greer (Jr.) SPNO1670605 TXID13014321, who duly sworn, deposed as follows: My name is Dennis Wayne Greer (Jr.), I am over 18 years of age, competent to make this affidavit and personally acquainted with the facts herein stated:

I. Shocking the conscious

II. Ineffective assistant of counsel

III. Violation of Client Attorney Privelege (Confidentiallity)

IV. Mental Anguish

V. Mental Discrimination

VI. Personal Vendetta

VII. Hate Crime

VIII. Violation of Due Process 5th Amendment

IX. Violation of 6th Amendment Speedy Trial Rights of the Accused

X. Title 18 USCS 1512, 1513, and 1558

XI. Title 42 Section 1985 Conspiracy towards a Black Persons

XII. Violation of the 14th Amendment Equal Protection and Just Compensation

XIII. Title 28 USCS 1343

XIII. Title 42 section 1983

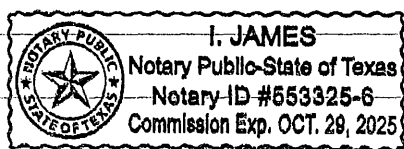
XV. Defamation of Character

XVI. Mind Stigma

XVII. Title 18 USCS all related provisions of section 1961 "Racketeering Activity"

XVIII. Texas Penal Code 36.06

The facts stated here are voluntary.



*[Signature]*  
Affiant

Sworn and Subscribed before me on the 12 day of July, 2022

*[Signature]*  
Notary Public In and for  
The State of Texas

**HARRIS COUNTY SHERIFF'S OFFICE JAIL**

Name Dennis W. Greer (Jr.)

SPN 01670605 Cell 3F2A

Street 1200 Baker St.

HOUSTON, TEXAS 77002



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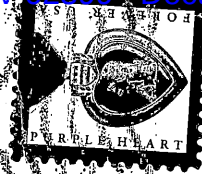
Nathan Ochsenrath

**INDIGENT**

Bob Casey  
Nathan ~~Ochsenrath~~ Ochsenrath  
515 Rusk Avenue  
Houston, Tx. 77002

NORTH HOUSTON TX 77060

15 JUL 2022 09:41



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